IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Abayomi H. Adeyemi)	Chapter 13
dba Hope for Children)	Case No. 18-00595 HWV
Debtor)	
)	
Pnc Bank, National Association)	
Movant)	
)	
Abayomi H. Adeyemi)	
dba Hope for Children)	
Respondent)	
Charles DeHart, III, Trustee)	

<u>DEBTORS' RESPONSE TO MOTION OF PNC BANK, NATIONAL ASSOCIATION</u> <u>MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362</u> <u>PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001</u>

- 1. Movant, PNC Bank, National Association, filed its Motion for Relief from Stay on May 14, 2019.
- 2. Debtor believes he has made all or substantially all the payments required. Debtor asserts the arrears figures stated in Movant's Motion for Relief are incorrect.
 - 3. Debtor requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtor, Abayomi H. Adeyemi, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed May 14, 2019 by PNC Bank, National Association.

Dated: May 28, 2019 Respectfully Submitted,

/s/Stephen Wade Parker Stephen Wade Parker (315606) Counsel for Debtors Mooney Law 2 S. Hanover Street Carlisle, PA 17013 Swp@mooney4law.com (717) 243-4770 Phone (717) 632-3612 Fax